

EXHIBIT 1

October 12, 2018

VIA ELECTRONIC MAIL

Joshua Lipshutz, Esq.
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Re: *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, No. 3:18-md-02843-VC (N.D. Cal.)

Dear Josh:

The consolidated complaint contains allegations that Facebook shared information and content from users with a variety of device makers, mobile carriers, software companies, and other business partners (collectively, “business partners”). *See, e.g.*, Consol. Compl. ¶¶ 169-74, Sept. 25, 2018, ECF No. 152-2. Accordingly, consistent with the Court’s prior ruling on discovery as to claims involving app developers, we write to ask that Facebook produce the following documents or information to Plaintiffs:

1. The identities of the business partners with which Facebook has shared its users’ information and content.
2. Copies of the agreements, if any, between Facebook and its business partners, pursuant to which Facebook shared its users’ information and content.
3. If already compiled or generated, a general description of the user information and content shared with business partners.

Let us know if you would like to discuss this further.

Very truly yours,



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BG:srs